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DATE

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

SEP 18 1991

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ACTION

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Mr. David Weber
Division of Wildlife
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State of Colorado
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Gentlemen:

The U.S. Department of Energy (DOE) Rocky Flats Office (RFO) requests consultation from the U.S. Fish and Wildlife Service (FWS) and the Colorado Division of Wildlife per the Fish and Wildlife Coordination Act (FWCA) regarding various water development projects which are planned at the Rocky Flats Plant (RFP) in Golden, Colorado. We also request that consultation requirements for the FWS per the Migratory Bird Treaty Act (MBTA) regarding various land and water alteration projects be consolidated with the interagency cooperation procedure required by the FWCA.

The projects include:

- 1) proposed interim measures (IMs)/interim remedial actions (IRAs) under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) at operable units (OU) one and four. These IM/IRAs include french drains constructed in the vicinity of Woman Creek and North Walnut Creek. Both french drain systems are designed to extract contaminated ground water.

At OU 1, the french drain has not yet been constructed and may have an adverse effect on surface water flow in both the South Interceptor Ditch (SID) and Woman Creek. In addition, its construction will result in the destruction of several large cottonwood trees and other vegetation. The approximate dimensions of this french drain is one-half mile long by 150 feet wide. Depending on the depth requirements of the french drain which are tied directly to the depth to bedrock, up to 1500 linear feet of wetlands could potentially be impacted along the SID.

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The french drain at OU 4 has already been constructed. However, the contaminated ground water extracted by the drain is currently being placed in the solar evaporation ponds. The plans are to install three temporary surge tanks and associated piping to contain and transfer water collected by the french drain. Portable flash evaporators to be located in Building 910 will be used to treat the collected water prior to reuse by the RFP. The location of the temporary surge tanks will be on the north side of North Walnut Creek opposite the solar ponds. Also, by not placing the contaminated ground water in the solar ponds as has been done in the past (in order to comply with the land disposal restrictions of RCRA) it is possible that less ground water will discharge at North Walnut Creek.

- 2) upgrading and installing surface water monitoring stations on Woman Creek, Walnut Creek and Rock Creek. The stations will consist of prefabricated plexiglass sheds, approximately six feet by 10 feet by seven feet tall, on concrete foundations. Flow meters, automatic samplers and telemetry systems will be included in the stations. Impacts to wetlands resulting from the installation of new stations will not exceed 11,000 square feet.
- 3) expanding sewage treatment plant Building 995. This expansion will consist of approximately 1600 square feet and will impact approximately 400 square feet of wetlands located northwest of Building 995.
- 4) Pond C-2 water transfer. This project would provide a temporary measure to reduce the volume of water in Pond C-2 when the volume exceeds the design capacity (10 percent of the total capacity) of the pond. Exceeding the design capacity can become a problem during the Spring runoff at the RFP. There should be no impact to wetlands resulting from this project.
- 5) dam safety improvements. This project entails safety improvements to several dams on plantsite and stems from annual U.S. Army Corps of Engineers inspections of 12 dams and additional inspections performed by the Colorado State Engineer's Office, Federal Energy Regulatory Commission, and the RFP contractor, EG&G Rocky Flats, Inc. The project consists of the following:
 - a) placing sand/rock blankets over wet areas located on the downstream toes of six dams,
 - b) stabilizing the toe of one dam,
 - c) restoring the spillway elevation of one dam,
 - d) repairing the damage caused by headcutting and placement of riprap on the spillways of two dams,
 - e) replacing a concrete slab with riprap at the outlet culvert and replacing the outlet gates with flumes on one dam,
 - f) reducing the angle of side slopes at the outlet channel of one dam,
 - g) installing upstream gates on four dams, and

- h) minor maintenance activities including removing excess vegetation (including trees) from the outlet works and/or dams at several locations.


It is estimated that approximately 10,000 square feet of wetlands will be impacted.

- 6) a new landfill (Subtitle D Facility). The landfill will consist of four cells excavated about 30 feet below the ground surface. An earthen berm, 10 to 20 feet high on the north and west sides of the landfill, will be constructed. Approximately 39 acres will be required for the landfill and a total of 57 acres will be disturbed during construction of the landfill, berm, building and soils stockpiling. The proposed site is characterized as a mid-grass prairie.

Since these activities have both potential safety impacts as well as impacts to meeting our deliverables in the Interagency Agreement signed by the U.S. Environmental Protection Agency, Region 8, Colorado Department of Health and DOE, we request that you assist DOE RFO with your FWCA and MBTA consultation as soon as your schedule allows.

Note that Bruce Thatcher of my staff will be contacting you to set up both a meeting and a field trip to the previously described project areas. You may contact Mr. Thatcher at 966-3532.

Sincerely,


David P. Simonson
Assistant Manager
for Environmental Management

cc:

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